

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: MINING PROJECT WIND DOWN HOLDINGS, INC. (f/k/a Compute North Holdings, Inc.), et al., Debtors.	§ § § § § § § § §	CHAPTER 11 CASE No. 22-90273 (MI) (JOINTLY ADMINISTERED)
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**DECLARATION OF JEFFREY D. KLOBUCAR IN SUPPORT OF ROHIT SHIROLE’S
EMERGENCY MOTION TO REDUCE DEADLINES FOR DISCOVERY AND COMPEL
DISCOVERY RESPONSES IN ANTICIPATION OF EMERGENCY MOTION FOR
TEMPORARY CLAIM ALLOWANCE PURSUANT TO BANKRUPTCY RULE 3018,
PURSUANT TO BANKRUPTCY RULES 7037, 9006(C), 9014, AND 11 U.S.C. § 105**

I, Jeffrey D. Klobucar, hereby declare that the following statements are true and correct to the best of my knowledge, information, and belief:

1. I am a shareholder at the law firm of Bassford Remele, P.A., am counsel of record for Rohit Shirole in the above-referenced matter, and submit this declaration in support of *Rohit Shirole’s Emergency Motion to Reduce Deadlines for Discovery and Compel Discovery Responses in Anticipation of Emergency Motion for Temporary Claim Allowance Pursuant to Bankruptcy Rule 3018, Pursuant to Bankruptcy Rules 7037, 9006(c), 9014, and 11 U.S.C. § 105* (the “Motion”).

2. Attached hereto as Exhibit A is a true and correct copy of an email exchange between me and counsel for the Debtors regarding certain requests for documents related to Shirole’s Claims (as defined in the Motion), that begins on October 31, 2022, and ends on January 3, 2023.

3. Attached hereto as Exhibit B is a true and correct copy of an email exchange between me and counsel for the Debtors regarding certain requests for documents related to Shirole's Claims that begins on January 10, 2023 and ends on February 2, 2023 (redacted to protect settlement communications).

4. On January 27, 2023, the Debtors produced the requested insurance policies, through counsel, via email. Debtors had not produced such policies at the time of the hearing on the motion for relief from stay, held on January 17, 2023.

5. Attached hereto as Exhibit C is a true and correct copy of Claim 10160 (amending Claim 10055) filed by Shirole.

6. Attached hereto as Exhibit D is a true and correct copy of Claim 10161 (amending Claim 10056) filed by Shirole.

7. Other than the insurance policies produced by the Debtors on November 4, 2022 and January 27, 2023, no other documents requested by Shirole, through counsel, have been produced by the Debtors.

8. Debtors have not indicated they intend to produce further documents requested by Shirole in advance of the February 9th hearing.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge, information, and belief.

Executed on February 3, 2023

By: /s/ Jeffrey D. Klobucar
Jeffrey D. Klobucar (MN #0389368)
Admitted Pro Hac Vice (ECF 190)